

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: KAREN LYNN HACKNEY Debtor SANTANDER CONSUMER USA, Movant v. KAREN LYNN HACKNEY, Respondent	: : : : : : : : : : : :	CHAPTER 13 CASE NO. 1:17-bk-03860
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ANSWER TO MOTION FOR RELIEF FROM STAY

1. Admitted.
2. Admitted as to Movant's request. Denied that Movant is entitled to relief.
3. Admitted.
4. A. 1. Admitted.
 2. Admitted.B. 1. Admitted.
 2. Admitted.
 3. Admitted.
 4. Admitted.C. 1. Admitted as to the value reflected in the NADA; proof of value of the vehicle is demanded at trial and this averment is therefore denied.
- D. 1. Proof of amounts owed is demanded at trial and this paragraph is therefore denied.
 2. Proof of default is demanded at trial and this paragraph is therefore denied, pending Debtor's research of payments made.

5. A. 1. Proof of default is demanded at trial and this paragraph is therefore denied, pending Debtor's research of payments made.

2. Proof of insurance will be provided.

WHEREFORE, the Debtor respectfully requests that this Court deny the motion for relief filed by the Movant and grant such other relief as this Court deems just.

Respectfully submitted,

/s/ Dorothy L. Mott

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